

FILED

UNITED STATES DISTRICT COURT

NOV 25 2020

for the
Western District of Texas

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____
DEPUTY CLERK

United States of America
v.
Julian NEAVES
(DOB: 08/13/2002)

Case No.

DR-20-2018M-01

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/23/2020 in the county of Kinney in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

8 USC 1324 (a)(1)(A)(ii) & (B)(i)

Illegal Alien Transportation- Knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Complainant's sign

Complainant's signature

Israel Borup, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/25/2020

Juc

Judge's signature

City and state: Del Rio, Texas

Victor Garcia, United States Magistrate Judge

Printed name and title

12-20-2018m-01

Attachment "A"

On November 23, 2020, at approximately 5:30 PM, Texas Department of Public Safety (TXDPS) troopers conducted a vehicle stop on a silver 2012 Chevrolet Traverse displaying Texas temporary license plate "86170Z2" on Highway 277 near Ranch Road 693 in Kinney County, Texas. The vehicle-stop resulted in a failure-to-yield vehicle pursuit, with speeds in excess of 100 miles per hour. Kinney County Sheriff's Office (KCSO) deputies and United States Border Patrol (USBP) agents responded to assist.

During the pursuit, TXDPS troopers observed two (2) rear passengers jump from the moving vehicle and land on the roadside, sustaining injuries. These injured passengers were identified as citizens of Honduras and El Salvador, unlawfully present in the US. The pursuit eventually came to an end on HWY 55 near Uvalde, Texas after a spike-strip was successfully utilized on the Chevrolet Traverse.

KCSO deputies encountered and arrested the driver, identified as Julian NEAVES, a US citizen, and one (1) rear passenger, identified as a citizen of Honduras, unlawfully present in the US. All occupants were transported to the Brackettville Border Patrol Station. Homeland Security Investigations, Del Rio, Texas (HSI Del Rio) responded to investigate. During a post-Miranda interview, NEAVES admitted to his knowledge and involvement in the offense.

NEAVES stated he traveled with a third party from San Antonio, Texas to Eagle Pass, Texas where he picked up three (3) illegal aliens (IA) from an unidentified IA stash house. NEAVES stated he was transporting the IAs to San Antonio when stopped by law enforcement and he fled. NEAVES stated he believed he was going to be paid an undetermined amount of money by the third party upon returning to San Antonio with the IAs.